

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

FILED
OCT - 9 2018
THE
CLERK, U.S. DISTRICT COURT
ALEXANDRIA, VIRGINIA

UNITED STATES OF AMERICA

V.

FATIMA HARISA SAHAD,

a/k/a Sandy Susoho,

a/k/a Jane Doe,

Defendant.

CASE NO. 1:18-MJ-483

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Hern Choi, being duly sworn, depose and say:

I. Introduction

1. I am an Enforcement Officer employed by the United States Department of Homeland Security, U.S. Customs and Border Protection (CBP). I am assigned to Washington Dulles International Airport located in Sterling, Virginia. I have been employed with CBP for over eleven years.

2. My duties as an Enforcement Officer for CBP include, but are not limited to, performing the full range of inspection, intelligence analysis, examination, and law enforcement activities relating to arrival and departure of persons, conveyance, and merchandise at the Port of Entry; identifying potential terrorists and instruments of terror and criminal activity; investigating administrative and criminal violations of the Immigration and Nationality Act and Titles 8 and 18 of the United States Code; and seeking, when applicable,

prosecution and removal of violators. I have received specialized training and I am experienced in the detection of counterfeit and altered documents.

3. I present this affidavit in support of a criminal complaint and arrest warrant for FATIMA HARISA SAHAD, also known as “Sandy Susoho” and “Jane Doe” (hereafter referred to as “SAHAD”). Based upon the following information, I believe there is probable cause to believe that SAHAD violated Title 18, United States Code, Section 1544, when she willfully and knowingly used, or attempted to use, a passport issued or designed for the use of another. In particular, SAHAD attempted to use a United States passport, which had been issued to Sandy Susoho, to enter the United States.

4. The facts and information contained in this affidavit are based on my training, experience, and personal knowledge, as well as the observations of other agents involved in this investigation. All observations not personally made by me were related to me by the individuals who made them or were conveyed to me by my review of records, documents, and other physical evidence obtained during the course of this investigation.

5. This affidavit contains information necessary to support probable cause for this application and is not intended to set forth all information known to the Government about this case.

II. Probable Cause for the Offense

6. On September 8, 2018, SAHAD arrived at Washington Dulles International Airport in Loudoun County, Virginia, within the Eastern District of Virginia, aboard South African flight 209 from Accra, Ghana.

7. Upon arrival, SAHAD was inspected by a CBP Officer conducting primary inspection (Primary Officer). SAHAD presented United States passport number XXXXX6543 to the Primary Officer. This passport had been issued in the name of Sandy Susoho and indicated a date of birth of July 21, 1994.

8. The Primary Officer used the Traveler Primary Arrival Client-FACE (TPAC-FACE) facial recognition software to attempt to biometrically verify SAHAD's identity. TPAC-FACE uses an airline's manifest data to retrieve existing traveler photos from government databases, including passport and visa databases, to build a photo gallery of travelers who are expected to arrive in the United States. The TPAC-FACE system did not match SAHAD's face with any of the photos of the passengers expected to be arriving on the flight.

9. During the primary inspection, the Primary Officer noted that SAHAD did not resemble the photograph in the passport (# XXXXX6543). The Primary Officer then asked for another form of identification. SAHAD did not present any other forms of identification.

10. The Primary Officer utilized the 1-to-1 facial comparison machine to compare SAHAD's photo directly with the photo electronically stored on the passport. This 1-to-1 comparison yielded a facial mismatch result. SAHAD was subsequently referred to Secondary Inspection.

11. In the secondary inspection area, a CBP officer conducting secondary inspection (Secondary Officer) performed an examination of SAHAD and her documents. During the examination, the Secondary Officer questioned SAHAD about the citizenship information and social security number contained in the Form DS-11 application for the U.S. passport

that she presented (# XXXXX6543). SAHAD responded, "I am a U.S. citizen" to the question about her citizenship and "I don't remember" to the question about her social security number. The Secondary Officer then asked SAHAD a question about her place of birth. SAHAD responded, "Bronx." The Secondary Officer also asked SAHAD a question about the passport she presented, to which she responded, "I don't know, someone gave it to me."

12. The Secondary Officer then searched for SAHAD's fingerprints using the Integrated Automated Fingerprint Identification System. The search returned a negative result, which indicates that SAHAD had no prior criminal justice or immigration contacts in the United States.

13. I took over the case and consulted with the involved Primary and Secondary Officers, then started an interview of SAHAD. During my interview with her, SAHAD stated that she is a student, and that she has been studying midwifery since September 2015.

14. SAHAD told me that she decided to leave her country, and that a man named "Junior" got her the U.S. passport belonging to Sandy Susoho. SAHAD also told me that Junior provided her with some financial support to travel to the United States.

15. On the afternoon of September 8, 2018, in a subsequent sworn interview, SAHAD told another CBP officer that she paid \$1,200 to Junior, also known as "Sarpong," in exchange for airline tickets and Susoho's passport. During this interview, SAHAD also told the CBP officer that she is a native and citizen of Ghana.

16. On October 4, 2018, I learned from a Special Agent from the Diplomatic Security Service, U.S. Department of State, that the passport control number printed on the passport

presented by SAHAD (# XXXXX6543) matches the machine-readable barcode on the DS-11 passport application submitted to the Department of State in the name of Sandy Susoho.

17. Based on the foregoing information, I submit to the Court that probable cause exists to believe that, on or about September 8, 2018, FATIMA HARISA SAHAD willfully and knowingly used, or attempted to use, a passport issued or designed for the use of another in violation of Title 18, United States Code, Section 1544.


Hern Choi, Enforcement Officer
United States Department of Homeland Security
U.S. Customs and Border Protection

Sworn and subscribed to before me
this 1th day of October, 2018.

 /s/
Michael S. Nachmanoff
~~United States Magistrate Judge~~
The Honorable Michael S. Nachmanoff
UNITED STATES MAGISTRATE JUDGE